EF files
023306

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 20 1997

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

Subject: Response to Request (May 30, 1996) to Upgrade (D236204) the Review of an Acute Copper Octanoate Studies with *Daphnia magna* (S# 23306) DP Barcode: D232684, Case: 046904, and *Oncorhynchus mykiss* DP Barcode: D230474 ID#: 067702-E, W. Neudorff GmbH KG c/o Walter G. Talarek, P.C.

From: Dennis J.McLane, Wildlife Biologist
Environmental Risk Branch I
Environmental Fate and Effects Division (H7507C)

Thru: Arnet Jones, Branch Chief 06/20/97
Environmental Risk Branch I
Environmental Fate and Effects Division (H7507C)

To: Janet Whitehurst, Team 22, Reviewer
Registration Division (7507C)

Guideline	MRID	Acceptability
72-2(a)	44192801	Core
72-1©	44116102	Core

023306a
023104
Cu Salts of fatty acids

The two subject studies have been upgraded to core or fulfills guideline requirements.

Acute Aquatic Invertebrate Toxicity

The major item of concern was the use of a 10% percent product that measured only 2% active ingredient. Neudorff addressed this as follows:

> "Both studies were conducted on an end-use product containing the active ingredient, i.e. copper octanoate, at ten percent (10%) by weight. This product was chosen as the test substance because the active ingredient is only formed during the end-use product manufacturing process; and this product contains the active ingredient at the highest concentration that will be produced and subsequently introduced into commerce by Neudorff. Moreover, the issue of

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what should be the test substance in this circumstance was discussed with Agency personnel, including Mr. Stone and Ms. Stowe of Team 22, on December 14 and 15, 1995, and the guidance given was to test the end-use product containing the active ingredient at its highest concentration. Acceptable analytical methods for analyzing copper octanoate include analyzing the copper by atomic absorption or the fatty acid [as a methyl ester] by gas chromatography and quantifying the total amount of copper soap. Therefore, the test laboratories which conducted the above studies tested for the test substances copper octanoate."

The above response is adequate and acceptable.

Also Neudorff provided the following table of the percent recovery.

Percent Recovery of A.I.						
	NEU1140F 2	NEU1140F 1	NEU1140F 0.5	NEU1140F 0.25	NEU1140F 0.125	NEU1140F 0.062
Cu (mg/l)	0.044	0.017	0.008	0.004	0.002	0.001
CU C8 (ai) (mg/L)	0.244	0.094	0.044	0.022	0.011	0.006
Expected ai	0.200	0.100	0.050	0.025	0.013	0.006
% Recovery	122%	94%	88%	88%	85%	100%

The percent recovery is adequate.

Acute Fish Toxicity Rainbow Trout

Based on the explanation concerning the test material reported above this study fulfills the guideline requirements. Therefore both studies fulfill the guideline requirements.

Please contact Dennis J. McLane (305-5096) if you have any further questions.